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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAR 17 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Telephone Number Portability)

CC Docket No. 95-116

DA 98-449

DA 98-451

REPLY COMMENTS OF AT&T CORP.

Pursuant to Sections 1.3 and 52.3(d) of the Commission's Rules, 47 C.F.R. §§ 1.3, 52.3(d), and the Public Notices released March 4 1998 and March 5, 1998, AT&T Corp. ("AT&T") hereby replies to the comments of other parties on the petitions for waiver of the Permanent Local Number Portability ("PLNP") Phase I implementation deadline of March 31, 1998 filed by various LECs.¹

AT&T's comments showed that the new Number Portability Administration Center/Service Management System ("NPAC/SMS") for the Western, Southeast and West Coast regions is scheduled to be in place on May 11, 1998, and that intercompany testing can be completed 30 days following that date. Phase I can then be completed two weeks following the close of intercompany testing. Phase II should follow two weeks after Phase

¹ A list of parties submitting comments and the abbreviations used to identify them are set forth in an appendix to these reply comments.

I, and Phase III two weeks after Phase II. Subsequent Phases can then be completed in accordance with the schedule established in the LNP Reconsideration Order.²

First, SBC's comments opine that rather than implementing Phase I within two weeks following intercompany testing, LECs should adopt what it calls a "phased approach" to PLNP deployment.³ As a preliminary matter, SBC's contentions ring utterly hollow in light of its own plans -- prior to its decision to seek a waiver of the PLNP deadlines for the Southwest Region -- to "flash-cut" PLNP in the Houston MSA on the very last day permitted by the Commission's schedule.⁴ SBC apparently has no objection to flash-cuts that serve to delay the availability of PLNP to its potential competitors, but objects to using them to minimize the effect of its already-delayed deployment of that capability.

SBC's purported concerns ignore the fact that, by the express terms of the Commission's Phase I Waiver Order, carriers in the former Perot NPAC regions must be fully prepared to deploy PLNP by March 31, 1998 in all respects other than those that

² First Memorandum Opinion and Order On Reconsideration, Telephone Number Portability, CC Docket No. 95-116, FCC 97-74, released March 11, 1997 ("LNP Reconsideration Order").

³ See SBC Comments, p. 2.

⁴ See Comments of AT&T Corp., filed March 9, 1998, p. 2 n.4 in SBC Companies Petition for Waiver Of Under 47 C.F.R. § 52.3(d) And Petition For Extension Of Time Of The Local Number Portability Phase I Implementation Deadline, CC Docket No. 95-116, NSD File No. L-98-16.

“specifically relate to the availability of the vendor-supplied [NPAC/SMS].”⁵ Thus, the “new processes, new hardware, software, platforms and architecture”⁶ to which SBC adverts need not be “phased-in” after intercompany testing -- indeed, by the express terms of the Phase I Waiver Order, LECs may not wait until that time to deploy them. Accordingly, SBC’s attempt to justify its proposed PLNP deployment schedule for the former Perot NPAC regions by comparing its timeline to the one the Commission established in its LNP Reconsideration Order is simply inapposite. The LNP Reconsideration Order addressed the implementation of all aspects of PLNP, not merely the NPAC/SMS. Moreover, unlike the original Phase I implementation schedule, Phase I deployment in the Western, Southeast and West Coast regions will follow implementation of both Phases I and II of PLNP in other regions. Accordingly, as AT&T showed in its comments, by its proposed revised Phase I implementation deadline, the industry will have gained valuable experience that should smooth PLNP deployment in the regions affected by NPAC/SMS delays.⁷

BellSouth attempts to justify its extraordinary claim that it requires 35 weeks to upgrade its NPAC/SMS interface on the ground that it “undertook its own internal hardware and software development effort” rather than relying on “third party vendors” that

⁵ Order, Telephone Number Portability, CC Docket No. 95-116, DA 98-152, released January 28, 1998, ¶ 8 (“Phase I Waiver Order”).

⁶ SBC Comments, p. 2.

⁷ See, e.g., Comments of AT&T Corp., filed March 12, 1998, p. 10 in Telephone Number Portability, CC Docket No. 95-116, DA 98-451.

have prior experience working with Lockheed.⁸ The fact that BellSouth's systems problems stem from its own information technology expertise rather than those of a vendor are immaterial to its waiver request (indeed, AT&T also developed its NPAC/SMS interface in-house). As AT&T and other commenters have shown, the limited explanation offered by BellSouth's petition falls woefully short of justifying the extreme delay that it seeks to impose on PLNP deployment in its region. BellSouth has not demonstrated that the systems difficulties it describes should take 35 weeks to resolve -- whether that work is done by BellSouth or by another firm. BellSouth's request to delay PLNP deployment until mid-November 1998 therefore should be denied, and it should be required to adhere to AT&T's proposed schedule.

MCI argues that all carriers should complete Phase I on the day following the completion of intercompany testing, rather than within two weeks of that date, as AT&T advocated.⁹ AT&T does not oppose MCI's proposal and, barring unforeseen difficulties, will be able to fulfill its Phase I obligations on the day following the completion of intercompany testing. AT&T continues to believe, however, that permitting two weeks for PLNP implementation is an appropriate industry-wide timetable in the Western, Southeast and West Coast Regions.

⁸ BellSouth Comments, p. 7.

⁹ MCI, Partial Opposition to Petitions for Waiver, filed March 12, 1998, p. 3 in Telephone Number Portability, CC Docket No. 95-116, NSD File Nos. L-98-23, L-98-28.

The brief implementation period AT&T proposes represents a reasonable “middle ground” between MCI’s approach and the unreasonable delays sought by many ILECs. AT&T expects to be able to implement PLNP on the day following the completion of intercompany testing, and is prepared to do so if the Commission so requires. However, it is readily foreseeable that, at least for some LECs, a certain amount of last-minute internal systems clean-up and preparation may be necessary following intercompany testing. If the Commission ordered Phase I implementation on the day following testing, such carriers would be forced to file last-minute waivers of very short duration in order to complete their final preparations. Other carriers then would be forced to adjust not only their own LNP implementation, but also their business plans, to account for unpredictable minor “glitches” that would delay PLNP while the petitioning carrier implements a fix that might take only a few days. AT&T’s proposed schedule would permit carriers to move ahead with their plans with greater confidence that no such eleventh-hour delays will arise.

Finally, MCI’s proposal to permit one day for Phase I implementation strongly underscores the fact that the ILEC petitioners simply cannot justify the long delays they seek to build into Phase I deployment. As AT&T showed in its comments, the two-week interval it proposes is more than adequate to permit carriers to do any last-minute clean-ups to their own systems and processes, and to prepare themselves to accept orders for PLNP.¹⁰

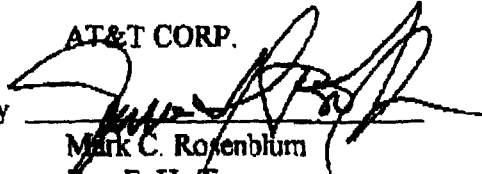
¹⁰ See Comments of AT&T Corp., filed March 12, 1998, pp. 7-10 in Telephone Number Portability, CC Docket No. 95-116, DA 98-451; Comments of AT&T Corp., filed March 12, 1998, pp. 13-15 in id., DA 98-449.

CONCLUSION

For the reasons stated above and in AT&T's comments, the Commission should establish the following deadlines for Permanent Local Number Portability implementation in the Western, Southeastern and West Coast regions by all carriers:

- NPAC "live" date: May 11, 1998 (or the date a "live" NPAC is actually available)
- Inter-company testing completed: June 11, 1998 (or 30 days after "live" date)
- LNP implementation in Phase I MSAs completed: June 26, 1998 (or 14 days after testing)
- LNP implementation in Phase II MSAs completed: July 10, 1998 (or 14 days after Phase I)
- LNP implementation in Phase III MSAs completed: July 24, 1998 (or 14 days after Phase II)
- Remainder of LNP implementation in compliance with the schedule established in the Commission's LNP Reconsideration Order.

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March 17, 1998

AT&T Corp.

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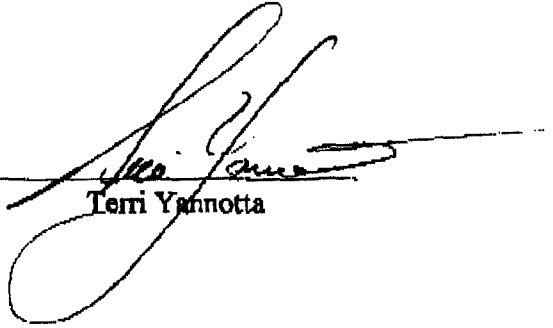
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Southwestern Bell Telephone, Pacific Bell and Nevada Bell ("SBC")

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CERTIFICATE OF SERVICE

I, Terri Yannotta, do hereby certify that on this 17th day of March, 1998, a copy of the foregoing "Reply Comments of AT&T Corp." was mailed by U.S. first class mail, postage prepaid, to the parties listed on the attached service list.



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